

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BOMBARDIER INC.,

Plaintiff,

v.

mitsubishi aircraft  
corporation, mitsubishi  
aircraft corporation america,  
inc., et al.,

Defendants.

2:18-cv-1543 RAJ

DECLARATION OF MARY Z. GASTON  
IN SUPPORT OF DEFENDANT  
MITSUBISHI AIRCRAFT CORPORATION  
AMERICA, INC.'S MOTION TO DISMISS  
FOR FAILURE TO STATE A CLAIM

NOTE ON MOTION CALENDAR:

Friday, January 11, 2018

ORAL ARGUMENT REQUESTED

Mary Z. Gaston declares:

1. I am a partner in the law firm of Perkins Coie LLP and counsel for Defendant Mitsubishi Aircraft Corporation America, Inc. ("MITAC America") in this action. Unless otherwise stated, I make this declaration based on personal knowledge of the events and matters described herein.

2. Attached as Exhibit A is a copy of the document titled "Employee Proprietary Information, Inventions, Non-Competition and Non-Solicitation Agreement," with a signature page (page 8) matching Exhibit R (Dkt. 1-27) to the Complaint (at page 4). The highlighting of Article 7 in Exhibit A was done by Perkins Coie.

DECLARATION OF MARY Z. GASTON IN SUPPORT OF  
DEFENDANT MITSUBISHI AIRCRAFT CORPORATION  
AMERICA, INC.'S MOT. TO DISMISS FOR FAILURE TO STATE A  
CLAIM (NO. 18-CV-1543 RAJ) – 1  
121153-0002/142485990.1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

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2 **I declare under penalty of perjury under the laws of the United States**  
3 **that the foregoing is true and correct**  
4

5 Executed this 20th day of December 2018.  
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10 s/Mary Z. Gaston  
11 Mary Z. Gaston  
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DECLARATION OF MARY Z. GASTON IN SUPPORT OF  
DEFENDANT MITSUBISHI AIRCRAFT CORPORATION AMERICA,  
INC.'S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM  
(NO. 18-CV-1543 RAJ) – 2

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**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that on December 20, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

DATED this 20th day of December 2018.

s/Mary Z. Gaston

Mary Z. Gaston, WSBA No. 27258

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CERTIFICATE OF SERVICE  
(NO. 18-CV-1543 RAJ) – 1

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